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August 9, 2012

VIA ELECTRONIC FILING
Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex Parte communications on Video Relay Service interoperability

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Services Program
CG Docket Nos. 03-123 and 10-51.

Dear Ms. Dortch:

The Technology Access Program at Gallaudet University has been conducting extensive tests on the interoperability of video calling equipment and software provided by the following five major video relay service (VRS) providers: Sorenson, ZVRS, Purple, SnapVRS, and Convo. The test results were presented at the NAD 2012 conference in Louisville, KY, on July 4, 2012, and are attached in this letter. The same materials can also be found at the following web address:
http://tap.gallaudet.edu/Conferences/NAD2012/

We note that currently there is no one single VRS-provided videophone that interoperates with every other VRS-provided videophone in point-to-point calls. As a result, it is currently impossible for a private party or a business to operate only one ten-digit number and be assured that they are reachable by every other caller, no matter whether deaf or hearing. We further note that interoperability across answering machines is worse than for live point-to-point calls, and that problems there extend to approximately half of all possible point-to-point combinations.

The implication is that particularly deaf-run businesses are at a serious disadvantage compared to their hearing counterparts, because no matter what videophone equipment they choose, there always will be a group of potential

customers who will be unable to call the business or leave a message on the answering machine.

Finally, the testing results show that interoperability for mobile devices is significantly worse than for computers and stand-alone equipment. In light of the continuing shift toward mobile devices, and the practice by several VRS providers to hand out mobile devices free of charge to new customers, this situation is of particular concern.

Respectfully submitted,

/s/ Christian Vogler[1]
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Co-Principal Investigator, RERC on Telecommunications Access
Gallaudet University

/s/ Norman Williams
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Gallaudet University

August 9, 2012

Cc (by e-mail):
Karen Peltz Strauss
Gregory Hlibok
Eliot Greenwald
Henning Schulzrinne
Richard Hovey
Robert Aldrich
Jonathan Chambers

Attachments (in the ECFS filing):
Spreadsheet containing the interoperability testing results
Handout summarizing testing results and method
PDF of the Power Point presentation at the NAD 2012 conference

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